IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

SOUTHWEST REINSURE, INC.,

Plaintiff,

v. **Case No. 11--CV-00689**

SAFFA REINSURANCE CO., LTD.,
VEHICLE EXTENDED REINSURANCE CO., LTD.,
and BAKERSFIELD GROUP REINSURANCE CO., LTD.

Defendants.

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1332(a), 1441(b) and 1446(a), Defendants, Saffa Reinsurance Co., LTD, Vehicle Extended Reinsurance Co., LTD, and Bakersfield Group Reinsurance Co., LTD, through their attorney, OLSEN, PARDEN & CROW, P.C. (Arlyn G. Crow, Esq.), gives Notice of Removal to this Court of the civil action filed in the Second Judicial District Court for the State of New Mexico, County of Bernalillo, Cause No. CV 2011-06175, by THUMA & WALKER, P.C. (David T. Thuma and Samuel I. Roybal) on behalf of Plaintiff, and as grounds therefore state:

1. On June 20, 2011, Plaintiff filed a Complaint for Restitution and/or Money Had and Received (*hereinafter* referred to as "Complaint") with the Second Judicial District Court, County of Bernalillo, State of New Mexico. A copy of the Complaint is attached hereto as Exhibit A.

2. On July 7, 2011, Defendants Vehicle Extended Reinsurance Co., LTD., and Bakersfield Group Reinsurance Co., Ltd., were served with the Complaint.

3. On August 1, 2011, Defendant Saffa Reinsurance Co., LTD., was served with the Complaint.

4. This Notice of Removal is timely as it is being filed within thirty (30) days after Defendants were served with the Complaint.

5. Pursuant to 28 U.S.C. § 1446(d), copies of the Notice of Removal will be promptly given to all adverse parties and a copy of the Notice of Removal will be filed with the Clerk of the Second Judicial District Court, County of Bernalillo, State of New Mexico.

6. The claims stated against Defendants in this case are subject to the jurisdiction of this Court pursuant to 28 U.S.C. § 1332, as follows:

A. Defendants are a Turks and Caicos Island Corporations duly licensed to conduct a reinsurance business in the Turks and Caicos Islands;

B. Defendants reinsured the obligations of Century Automotive Service Corporation (Century), a California Corporation, which was the obligor on vehicle service contracts issued by certain dealerships in Bakersfield, California;

C. The Executive officers for the Defendants are, and were, located in Bakersfield, California;

D. All of the executive decisions for the Defendants were made in California;

E. There is complete diversity between the parties to this lawsuit; and

F. The Complaint alleges an amount in dispute greater than $75,000.00.

G. This Court has diversity jurisdiction because Plaintiff is a New Mexico Corporation and Defendant is a Turks and Caicos Island Corporation and the amount in controversy is greater than $75,000.00.

7. Pursuant to Rule 81.1(a) of the Local Rules of the United States District Court for the District of New Mexico, Defendants will, within thirty (30) days, file a Notice of Filing of State Court Record and certified copies of the pleadings filed in the First Judicial District for the State of New Mexico, County of Bernalillo in Cause No. CV 2011-06175.

8. All of the Defendants are represented by undersigned counsel and concur in the removal of this action.

Respectfully submitted,

OLSEN, PARDEN & CROW, P.C.

By: /s/ Arlyn Crow
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I hereby certify that on this
5th day of August 2011,
the foregoing was electronically
served on:

David T. Thuma, Esq.
dthuma@thumawalker.com

/s/ Arlyn Crow
Arlyn Crow